

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF ARKANSAS**

UNITED STATES OF AMERICA

v.

CASE NO. 4:19:CR00633 BSM

SHONQUELOUS VITEE BURNETT

MOTION FOR BOND HEARING

The Defendant, Shonquelous Vitee Burnett, by and through his attorney, Erin Cassinelli, states in support of his Motion for Bond Hearing:

1. On November 6, 2019, the Grand Jury for the U.S. District Court for the Eastern District of Arkansas returned an indictment charging Mr. Burnett with conspiracy to possess with intent to distribute cocaine hydrochloride and cocaine base and with being a felon in possession of a firearm. On November 15, 2019, Mr. Burnett plead not guilty and reserved his right to request a detention hearing.

2. Mr. Burnett now asks the Court to schedule a detention hearing. At this time, the government is seeking detention.

WHEREFORE, the Defendant, Shonquelous Burnett, asks the Court to grant his motion, and for any other relief the Court finds appropriate.

Respectfully submitted,

/s/ **Erin Cassinelli**
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